

REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Final Office Action dated January 10, 2007 has been received and its contents carefully reviewed.

No claims are hereby amended; no claims are hereby canceled; no claims are hereby added. Accordingly, claims 1-28 remain currently pending. Reexamination and reconsideration of the pending claims are respectfully requested.

In the Office Action, claims 1-6, 8-11, 13-20, 22-25 and 27-28 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 6,333,769 B1 (to Suzuki et al.)(hereinafter “Suzuki”) in view of U.S. Patent No. 6,411,351 B1 (to Zhang et al.)(hereinafter “Zhang”). Claims 7, 12, 21 and 26 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Suzuki in view of Zhang and further in view of U.S. Patent No. 5,686,976 (to Nishikawa)(hereinafter “Nishikawa”).

The rejection of claims 1-14 is respectfully traversed and reconsideration is respectfully requested. Claims 1-14 are allowable over the cited references in that each of these claims recite a liquid crystal display device having combination of elements including, for example, “a substrate of an in-plane switching liquid crystal display device having a display part and a non-display part; a gate line on the substrate; ...and at least one capacitor in the non-display part and connected to at least one of the gate line, the common line and the data line for storing a remaining component of the display part and eliminating the stored component.” None of the cited references including Suzuki and Zhang, singly or in any combination, teach or suggest at least these features of the claimed invention. Applicants assert that Zhang is not drawn to an in-plane switching liquid crystal display device. Accordingly, it would not be obvious to combine the in-plane structure of Suzuki with the non in-plane structure of Zhang because Suzuki and Zhang involve fundamentally different structures.

The Examiner has argued that, “the devices of Suzuki and Zhang constitute analogous LCD art. Furthermore, the structure of an IPS LCD device versus a matrix LCD device does not distinguish the placement of the capacitors as claimed, and it would have been obvious to combine the references as stated (Office Action at page 2).” This argument is respectfully

traversed. The issue is not one of analogous art. Rather, the issue is one of a proposed combination of incompatible structures. Furthermore, it is not merely a placement of capacitors that is claimed. Rather, it is the liquid crystal display device as claimed.

Accordingly, Applicants request withdrawal of the instant rejections.

Even if, *arguendo*, the references are combinable as the Examiner asserts, Zhang does not teach at least, “at least one capacitor... connected to at least one of the gate line, the common line and the data line for storing a remaining component of the display part and eliminating the stored component.” In fact, Zhang Figure 1 shows capacitor (107) connected to a short ring (102) and not a data line as the Examiner maintains. Accordingly, Applicants submit that claim 1 and claims 2-14, which depend either directly or indirectly on claim 1, are allowable over the cited references.

The rejection of claims 15-28 is respectfully traversed and reconsideration is respectfully requested. Claims 15-28 are allowable over the cited references in that each of these claims recite a method of fabricating a liquid crystal display device having a combination of elements including, for example, “providing a substrate of an in-plane switching liquid crystal display device having a display part and a non-display part;... and forming at least one capacitor in the non-display part and connected to at least one of the gate line, the common line and the data line for storing a remaining component of the display part and eliminating the stored component.” None of the cited references including Suzuki and Zhang, singly or in any combination, teach or suggest at least these features of the claimed invention. Applicants assert that Zhang is not drawn to an in-plane switching liquid crystal display device. Accordingly, it would not be obvious to combine the in-plane structure of Suzuki with the non in-plane structure of Zhang because Suzuki and Zhang involve fundamentally different structures.

The Examiner has argued that, “the devices of Suzuki and Zhang constitute analogous LCD art. Furthermore, the structure of an IPS LCD device versus a matrix LCD device does not distinguish the placement of the capacitors as claimed, and it would have been obvious to combine the references as stated (Office Action at page 2).” This argument is respectfully traversed. The issue is not one of analogous art. Rather, the issue is one of a proposed combination of incompatible structures. Furthermore, it is not merely a placement of

capacitors that is claimed. Rather, it is the liquid crystal display device as claimed. Accordingly, Applicants request withdrawal of the instant rejections.

Even if, *arguendo*, the references are combinable as the Examiner asserts, Zhang does not teach at least, “forming at least one capacitor...connected to at least one of the gate line, the common line and the data line for storing a remaining component of the display part and eliminating the stored component.” In fact, Zhang Figure 1 shows capacitor (107) connected to a short ring (102) and not a data line as the Examiner maintains. Accordingly, Applicants submit that claim 15 and claims 16-28, which depend either directly or indirectly on claim 15, are allowable over the cited references.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911.

Dated: April 10, 2007

Respectfully submitted,

By Valerie P. Hayes
Valerie P. Hayes
Registration No.: 53,005
MCKENNA LONG & ALDRIDGE LLP
1900 K Street, N.W.
Washington, DC 20006
Attorneys for Applicant